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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

BOB STUMP, Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

AUG 05 2014

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IN THE MATTER OF THE
APPLICATION OF LIBERTY UTILITIES
(LITCHFIELD PARK WATER AND
SEWER), CORP. FOR APPROVAL OF
AN EXTENSION OF THEIR
CERTIFICATE OF CONVENIENCE AND
NECESSITY FOR WATER UTILITY
SERVICE IN MARICOPA COUNTY,
ARIZONA.

DOCKET NO. W-01427A-14-0134

IN THE MATTER OF THE
APPLICATION OF LIBERTY UTILITIES
(LITCHFIELD PARK WATER AND
SEWER), CORP. FOR APPROVAL OF
AN EXTENSION OF THEIR
CERTIFICATE OF CONVENIENCE AND
NECESSITY TO PROVIDE
WASTEWATER UTILITY SERVICE IN
MARICOPA COUNTY, ARIZONA.

DOCKET NO. SW-01428A-14-0180

**VALLEY UTILITIES WATER
COMPANY, INC.'S MOTION
TO CONSOLIDATE**

Valley Utilities Water Company, Inc. ("Valley Utilities"), through undersigned counsel, hereby files a motion to consolidate the above captioned dockets with Docket No. W-01412A-14-0262 pursuant to Arizona Administrative Code (A.A.C.) 14-3-109(H) for the foregoing reasons:

1. On April 17, 2014, Liberty Utilities (Litchfield Park Water and Sewer), Corp. ("Liberty") filed its Application for extension of its current Certificate of Convenience and Necessity ("CC&N") in Docket No. W-01427A-14-0134 to provide water utility service to a new area ("Marbella Ranch") in Maricopa County, Arizona.

2. On June 3, 2014, Liberty filed a related Application for extension of its

1 wastewater CC&N in Docket No. SW-01428A-14-0180 to provide wastewater utility
2 service to Marbella Ranch. An Amended Application was subsequently filed on June 4,
3 2014.

4 3. On June 5, 2014, Liberty filed motions to consolidate the water and
5 wastewater dockets, and on June 13, 2014, a Procedural Order was issued consolidating
6 the two dockets.

7 4. On June 18, 2014, Valley Utilities filed an Application for Leave to
8 Intervene and Notice of Intent ("Intervention Application") in these dockets. As part of
9 the Intervention Application, Valley Utilities informed the parties that, within 30 days of
10 that filing, Valley Utilities intended to file a competing Application for Extension of
11 Certificate of Convenience and Necessity to serve Marbella Ranch ("Competing
12 Application"), and thereafter intended to file a Motion to Consolidate all of these dockets.
13 Marbella Ranch is immediately adjacent to both Valley Utilities and Liberty Utilities.

14 5. On June 30, 2014, intervention was granted to Valley Utilities.

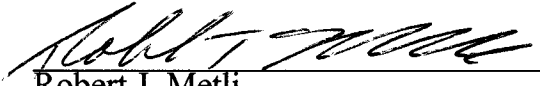
15 6. On July 10, 2014, Valley Utilities filed its Competing Application, Docket
16 No. W-01412A-14-0262. This Competing Application seeks authority for Valley Utilities
17 to provide water service to the same service area, Marbella Ranch.

18 7. On July 31, 2014, the Staff of the Arizona Corporation Commission issued a
19 Sufficiency Letter to Valley Utilities in Docket No. W-01412A-14-0262.

20 WHEREFORE, Valley Utilities respectfully requests that the Commission issue an
21 Order pursuant to A.A.C. 14-3-109(H), granting consolidation of Docket No. W-01427A-
22 14-0134, Docket No. SW-01428A-14-0180, and Docket No. W-01412A-14-0262. The
23 issues raised in each of these dockets are substantially the same and none of the parties
24 will be prejudiced by such consolidation. Consolidation will not unduly broaden the
25 nature or scope of these proceedings and will not delay these proceedings.
26

1 RESPECTFULLY SUBMITTED this 5th day of August, 2014.

2
3 MUNGER CHADWICK, P.L.C.

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5 
6 Robert J. Metli
7 2398 E. Camelback Road, Suite 240
8 Phoenix, Arizona 85016
9 Attorneys for Applicant Valley Utilities
10 Water Company, Inc.

11 Original and 13 copies of the foregoing
12 filed this 5th day of August, 2014, with:

13 Docket Control
14 Arizona Corporation Commission
15 1200 West Washington Street
16 Phoenix, Arizona 85007

17 Copies of the foregoing hand-delivered this
18 5th day of August, 2014, to:

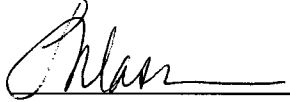
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